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Latter-day Saints*

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

LAURA A. GADDY, individually and  
on behalf of all others similarly  
situated,

Plaintiffs,

v.

CORPORATION OF THE  
PRESIDENT OF THE CHURCH OF  
JESUS CHRIST OF LATTER-DAY  
SAINTS, a Utah corporation sole,

Defendant.

**NOTICE OF NON-OPPOSITION  
TO “MOTION TO AMEND  
PRAYER FOR RELIEF IN  
[PROPOSED] SECOND  
AMENDED COMPLAINT”**

Case No. 2:19-cv-00554-RJS

The Honorable Robert J. Shelby  
The Honorable Dustin B. Pead

Defendant Corporation of the President of The Church of Jesus Christ of Latter-day Saints (the “Church”) submits this Notice of Non-Opposition to Plaintiff’s “Motion to Amend Prayer for Relief in Proposed Second Amended Complaint” (Docket 95). The Church does not oppose the substitute prayer for

relief or the addition of the allegation in paragraph 277 to the proposed Second Amended Complaint. The Church understands Ms. Gaddy's instant motion to seek only leave to amend the *proposed* Second Amended Complaint—not that she be permitted to *file* that proposed Second Amended Complaint as amended. To be clear, the Church maintains that Ms. Gaddy's Motion for Leave to File the Proposed Second Amended Complaint should be denied. *See* Dockets 85, 91, and 92. That motion is fully briefed, and Ms. Gaddy's current proposed amendments do not alter the arguments raised by the parties in that motion. Given the Church's non-opposition to the instant motion, no further briefing on it or the Motion for Leave to File Second Amended Complaint is required or should be permitted.

DATED: June 11, 2021.

STOEL RIVES LLP

/s/ David J. Jordan

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